



March 13, 1992

In Reply
Refer To: HW-113

Robert L. Geddes
Senior Environmental Engineer
Monsanto Chemical Company
P.O. Box 816
Soda Springs, ID 83276

Subject: Phase 1 Remedial Investigation/Feasibility Study for the
Monsanto Soda Springs Facility

Dear Mr. Geddes:

We have received your February 27, 1992 letter transmitting water quality data and a revised Remedial Investigation/Feasibility Study (RI/FS) project schedule. We have also received your February progress report and noted your concerns about RI/FS Work Plan approval and cost documentation. This purpose of this letter is to approve the Work Plan and respond to your other concerns.

By this letter the U.S. Environmental Protection Agency (EPA) approves the Phase 1 Remedial Investigation/Feasibility Study (RI/FS) Work Plan submitted by Monsanto on October 10, 1991, as modified by Monsanto's December 14, 1991 letter and the schedule provided with Monsanto's February 27, 1992 letter.

While EPA has approved the schedule as submitted on February 27th, we are still looking for opportunities to achieve the goals of the Work Plan and the Administrative Order on Consent (AOC) in a more timely manner. EPA recognizes that the delays which have resulted in schedule slippages to date have been largely beyond Monsanto's control, but remains committed to finding ways to shorten the length of this project. Earlier resolution of this site would seem to serve everyone's best interest by protecting the environment, allowing the Agency to focus its resources elsewhere, and saving money for your company.

The next opportunity to speed up the schedule seems to be in development of Phase II RI/FS plans. While some decisions cannot be made before completion of the Phase I FS, others can. For example, you yourselves intend to suggest modifications in the ground water monitoring program based on available data. We should all be evaluating the remaining data needs and work plan objectives with an eye toward the next data gaps to address, and where possible, address them this summer.

AR

2.1

0004

6303

In addition, rather than wait until July to start working on the Phase II RI/FS and then have 45 days of Agency review, perhaps we could follow our recent successful pattern and meet much earlier. We would be interested in talking about Phase II as soon after receiving the Site Characterization Summary as you have some draft plans or ideas to discuss.

In the same vein, EPA is beginning work on the risk assessment for the site this year, rather than wait until next year as shown in your schedule. In early April you can expect a paper outlining the proposed exposure scenarios EPA which is considering for the Monsanto site. EPA and its contractors are now working on preliminary criteria for selecting chemicals of concern for risk assessment purposes. We will also be evaluating the Site Characterization Report with an eye toward risk assessment data needs in hopes that data gaps could be addressed this summer.


While EPA is trying to shorten the schedule in most areas, we are concerned that the schedule for the next ground water sampling may be too tight. We understood from our last meeting that Monsanto is planning to provide EPA with proposed sampling locations and analytes in late March, along with supporting data and justifications for any proposed changes from the existing plan. EPA would then receive the Site Characterization Summary on April 24th and sampling would begin May 5th. We are concerned that EPA will not have enough time to evaluate the data and your proposals and respond in a timely manner, and that we may not have enough time to arrange for the appropriate oversight samples and analysis.

Assuming that my understanding is correct and that you are able to meet the schedule you proposed, we would prefer that you delay the sampling schedule by 1 week. Sampling would then occur during the week beginning May 11th. I have spoken to Christine Psyk and she said that she believes that Kerr-McGee's schedule might be able to be similarly adjusted without serious consequences. Please consider this proposal and keep Jim Eldridge of SAIC (206-485-2818) informed of your proposed sampling plans.

In your latest monthly report you again asked about billing for oversight costs. I have just received an updated estimate of costs, and have been told that billing will be done soon. I understand that the Government's costs were approximately \$60,000 from the signing of the AOC until the end of the federal fiscal year (9/30/91). The reported total from November 1, 1991 through mid-February is approximately another \$42,000. I have relayed your request for more frequent statements, but am not optimistic that it will be feasible in the near future. I will pass on more details about costs as they become available to me.

For your information, I will be out of the office on vacation from March 16th through the 27th. If you have questions or information pertaining to the RI/FS Work Plan which cannot or should not wait until I return, please contact Jim Eldridge of SAIC. If Jim cannot be reached, please contact Kevin Oates of EPA at (206) 553-1993. If you have questions of a legal nature or questions regarding Agency policy in my absence, please contact Charles Ordine at (206) 553-1504.

Sincerely,


Timothy H. Brincefield
Superfund Project Manager

cc: Kevin Oates, EPA Superfund
Charles Ordine, EPA ORC
Christine Psyk, EPA Superfund
Lorraine Edmond, EPA ESD
Don Matheny, EPA ESD
Gordon Brown, IDHW
Mike Thomas, IDHW
Jim Eldridge, SAIC
David Banton, Golder Associates